ROBERT WISNIEWSKI P.C. ATTORNEYS-AT-LAW

225 BROADWAY, SUITE 1020 • NEW YORK, NY 10007 T EL: (212) 267-2101 • FAX: (212) 587-8115 W EBSITE: www.rwapc.com

April 5, 2018

The Honorable James Orenstein, USMJ 225 Cadman Plaza East Courtroom 11D South Brooklyn, New York 11201 VIA ECF

Re: Godlewska, et al. v. HDA, Human Development Association, Inc., et al. Docket No.: 03 Civ. 3985 (JO)

Dear Judge Orenstein,

Please accept this letter as a personal appeal to you to move the trial date from April 30, 2018 to May 10, 2018 or to any day thereafter. Defense counsel does not oppose this request. There is no prejudice to any party.

While opposing counsel and I are complying with your April 2, 2018 order, I am forced to appeal to you to allow me the courtesy of moving the trial date owing to my personal obligations. I did raise this issue with you on our March 30 joint motion to reconsider, but I was circumspect in describing the reasons for my trip, as I did not want to put my personal affairs on the record. The reason for my trip to Poland is not leisure but a religious obligation to complete the process of mourning for my mother, who died in Warsaw on November 29, 2017 and was buried in her family tomb in a small town in northeastern Poland. Given my mother's wishes which comply with the local Catholic tradition and the prominence of my mother's family in that town, I have a religious obligation to attend a belated requiem mass and as many days of the so-called thirty-day continuing mass as I can. I was unable to organize these masses when I was in Warsaw in December of 2017 because I was preoccupied with an investigation by Warsaw prosecutors into the circumstances of my mother's death who at the time was under the care of a home attendant. Ultimately, the investigation was closed in early January of 2018 and I decided not to press charges for the theft of jewelry. The masses in question are to begin on April 29, the monthly anniversary of my mother's death. In addition, I agreed to meet with other family members who are scheduled to attend these masses to resolve a thorny issue of the limited number of spaces in the family tomb. I have tickets for a flight to Warsaw on the night of April 23, returning May 8, 2018, which tickets I bought before you set the April 30, 2018 as the trial date at the March 19, 2018.

For these reasons, I respectfully request that you consider my personal circumstances and grant me the courtesy of pushing the trial date from April 30, 2018 to May 10, 2018 or to any other date agreeable to you. Thank you.

Respectfully submitted,

/s/Robert Wisniewski
Robert Wisniewski

ce: Richard Howard, Esq.
Counsel for Defendants